

**Tracking Table: Written Comments to Public Draft Delta Conservancy Strategic Plan, 2012**

Date Received	Correspondent; method	Comment	How Addressed
3-30-12	Lisa Kirk; over phone	Strategy 3.3: sounds like most of the focus is going to be on ag. What about other sectors of the Delta economy like tourism and recreation? What about small businesses?	Please see strategies 1.1.2 and 2.1.2 that address this concern.
		Overall: Please stop referring to land-owners. There are many Delta interests that do not own land—they lease or rent it. They still depend on the Delta for their livelihood. Prefer term such as “interest,” “stakeholder,” or “businesses.”	Edits were made throughout the document where appropriate to address this concern.
4-16-12	Glen Lazof; email	<b>Recreational Marina Improvements.</b> The Conservancy ought to consider supporting recreation marina improvements because better marinas will bring more visitors and can help convert city folk into Delta Advocates. Projects could include grants and loans to fund marina improvements or the Conservancy could be involved in a model green Marina (which would be especially cool in a site that was formerly dilapidated).	Please see strategy 2.1.2.
		<b>Water Clean Up:</b> Anyone who makes frequent trips in our waterways (as I do), is aware of abandoned vessels and pieces thereof scattered about, as well garbage and debris along the levees. Much of this is difficult to clean up except from the water. Projects could also utilize community volunteers and partnerships with cities, counties, and reclamation districts to mitigate waste hauling expenses. My recommendation would be seek a planning grant to study both options and existing civic resources that might be leveraged. The result is cleaner water, safer habitat, and the creation	Comment noted. The Conservancy has investigated options with the California Department of Boating and Waterways as well as the Coast Guard, both of whom have jurisdiction regarding abandoned vessel removal. The Conservancy also is investigating options regarding participating in the Great River Cleanup, which happens every September.

Date Received	Correspondent; method	Comment	How Addressed
		of better experience for visitors.	
4-20-12	Mark Pruner; email	Emphasize commitment to ensure that all projects do not disturb, and in fact enhance, the ability of local government (such as schools, reclamation districts, fire districts, library resources, and other local districts) to deliver their services to the residents, businesses and visitors in the Delta.	Please see Priorities and Criteria, Section V for information about the Conservancy's approach to working with Delta residents, businesses, and local governments.
		Provide support for the increased impact upon local government and local districts in the Delta which are created during, and by virtue of, all projects and activity in which the Conservancy participates.	Policy question for the Board
		Establish clear and understandable descriptions, definitions and quantitative statements so that the public easily understands what is mean by "restoration" wherever that term appears	As the Strategic Plan is programmatic rather than site specific, the strategies are conceptual. As actual projects are identified, the requested specificity will be provided.
		Incorporate flood protection up to 200-year protection level, access to surface water for all parcels, and viewing recreation and tourism in ways that always enhance agriculture in all projects.	Statutory obligation for flood protection is with the Central Valley Flood Control Board and the California Department of Water Resources Flood Management Division. The Strategic Plan outlines the Conservancy's plan to incorporate local Delta needs in its implementation of projects in which it participates.
		Commit to consistent public outreach to the residents and businesses in the Delta.	Please see Strategy 5.4.2. The Conservancy sees public outreach to the residents and businesses in the Delta as the key to its success in any endeavor.
		At all times approve only projects which enhance and protect the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place. (CPRC sec 29702.)	Policy question for the Board? May be too limiting. Incorrect PRC section (pertains to DPC, not DC).
4-20-12	Local Agencies of the	Have effective and adequate monitoring and	Please see Section V, Priorities and Criteria for a full

Delta Conservancy Strategic Plan Table of Written Comments

Date Received	Correspondent; method	Comment	How Addressed
	North Delta (LAND), letter	performance criteria.	discussion about how the Conservancy intends to select or fund projects, which includes a commitment to long-term monitoring.
		The Conservancy should not be the <i>de facto</i> recipient of eminent domain transfers from other entities in an attempt to subvert its statutory requirement (PRC sec. 32370). The Strategic Plan should include this as a policy.	Policy question for the Board.
		Coordinate with local reclamation, water and other special districts for its restoration activities to achieve mutually beneficial effects at lower costs.	Please see Priorities and Criteria, Section V for information about the Conservancy's approach to working with Delta residents, businesses, and local governments. Please also see strategies 1.4.2; 1.4.43.1.5; 3.2.1; 4.1.2; and 4.1.3 for more information.
		Strategy 1.7.3 should include developing and targeting programs for Delta students	Educational strategies have been combined into Objective 1.1 to provide more emphasis on regional (i.e., Delta) focus.
		Objective 1.6 should include a specific approach to managing methyl mercury and organic carbon from restoration projects.	Strategy 1.3.1 indicates the Conservancy's intention to adopt appropriate policies and restoration criteria.
		Objective 2.2 could be expanded by including a certification program for sustainable Delta agriculture.	This objective was combined with others to create a new strategy 2.1.2, which emphasizes partnering with local interests (via task forces) to establish the kinds of economic enhancement programs or projects most important to them.
		Objective 2.5 (assist in enhancing Delta agriculture) could be more fully developed by adding: 1) identification of agricultural grant programs and support of conservation reserve/wildlife habitat improvement projects and 2) pilot terrestrial and aquatic week management programs or underseepage management projects.	Objective 2.5 became Objective 1.2 in the new draft, which can be edited to include identifying agricultural grant programs. Your suggestion regarding pilot projects is a good one, and the Conservancy will try to incorporate that into its draft to the Board.

Date Received	Correspondent; method	Comment	How Addressed
4-20-12	Sierra Nevada Conservancy, email	<p>The Delta Conservancy's Strategic Plan would benefit by clearly identifying the link between the water challenges faced in the Delta and the conditions in the upper watershed; the failure to recognize the relationship of Sierra Nevada watersheds and the long-term sustainability of the Delta ecosystem in your Strategic Plan would be a significant omission.</p> <p>The Sierra Nevada Conservancy welcomes being identified as a partner in collaborative efforts to enhance not only the Delta, but the watersheds that produce its key feature—water.</p>	<p>The Conservancy will attempt to add clarifying language regarding the connection between the larger watersheds and the Delta in its next draft of its Strategic Plan.</p> <p>The Sierra Nevada Conservancy has been helpful to the Delta Conservancy and we look forward to future partnerships.</p>
4-20-12	Solano County Department of Resource Management, letter	Solano County recognizes the important role the Delta Conservancy may play, and supports the Conservancy's commitment to work with local communities.	Comment noted.
4-20-12	SFCWA, letter		
	General comments	Lack of specific focus on developing capacity to take on management role for habitat projects and lands likely to be initially developed by other entities.	The Conservancy's enabling legislation allows the agency to hold title to lands and to hold easements. While we anticipate this role we are also sensitive to concerns raised about the Conservancy being a major consolidator of publically owned lands in the Delta. We have committed to working collaboratively with our sister agencies and the recently formed Delta Land Trusts Workgroup to, on a project by project basis, identify which agency or organization can most effectively and efficiently get a targeted piece of land under ownership, restore the land if not already restored and manage the land in perpetuity.

Date Received	Correspondent; method	Comment	How Addressed
		Leading the Delta Restoration Network overstates the Conservancy's role in planning habitat actions in the Delta.	The proposed Delta Restoration Network is intended to be a forum where the agencies responsible for ecosystem restoration in the Delta, and the Delta community can work to collectively develop a restoration framework. While we hope to lead the effort to convene this group, facilitate the discussions and push the effort to completion, we anticipate the product of that effort to be a product of the group, not the Delta Conservancy. We will make appropriate changes in the text to clarify the intent.
		The strategic plan does not sufficiently establish priorities and criteria for projects and programs, per the legislative directive.	We believe the referenced legislative language anticipated significant funding to meet Conservancy mandates would have been provided at the creation of the Conservancy. Absent any project funding we have opted to address the development of program and project priorities and criteria in the development of such programs as funding sources and purposes are identified. The process of developing priorities and criteria is an official rule making process and therefore our intent is to carry out that process when funding specifics are available thereby reducing the potential to have to do it multiple times.
		Language in the SP indicates that the Delta Protection Commission's Resource Management Plan and policies override the Delta Plan	It was not our intent to imply, nor is it our understanding that DPC plans and policies could override the Delta Plan. We will revise language accordingly.

Date Received	Correspondent; method	Comment	How Addressed
		The SP perpetuates a supposed priority of preserving agricultural lands as opposed to increasing habitat.	The legislation provides 12 mandates, the first being to protect and enhance habitat and habitat restoration, the second being to protect and preserve Delta agriculture and working landscapes. Further the legislation creates the expectation that the Conservancy will conduct ecosystem restoration and economic development in a balance manner. We believe our SP is consistent with the intent of the legislation in this regard.
	Specific comments		
	P8/ Line 1-6	Habitat restoration should be included in this section.	Comment noted, section revised.
	P10 /Line 1-3	The DPC Land Use and Resource Management Plan must be reviewed by the Delta Stewardship Council and any inconsistencies with the Delta Plan will require revision of the LURMP.	Any revision of the LURMP and or consistency issues with the final Delta Plan could require revision of the Conservancies Strategic Plan. The SP will be reviewed against the final Delta Plan to determine the need for revision.
	P10/Line 5-7	The \$3 Billion figure should specify if that is for the Primary Zone or the Legal Delta.	Legal Delta.
	P20/Line 17-19	Why is SWRCB flow criteria for the Delta mentioned?	Provides context for Delta restoration. The Conservancy has repeatedly heard from Delta interest concerns about habitat restoration and associated flow requirements.
	P20/Line 21-22	The statement that performance measures would seek maintenance or increases of gross revenues of Delta agriculture, was recognized as an error at a DSC meeting and will not be included in the 6 <sup>th</sup> draft. General concern about referencing anything in the 5 <sup>th</sup> draft.	The Conservancy has committed to completing our Strategic Plan within the statutory time limit. We will review and revise the SP as required for consistency with the final Delta Plan. The error will be verified and removed from the next draft of the SP.
*	P21/Line 9-10	This section should reference Water code 85320 (e) to avoid the impression that if all criteria are met, BDCP adoption by the Stewardship Council is discretionary.	Reference to 85320(e) will be added.
	P21/Line 17-29	Land us policies cited are subject to consistency review against the final Delta Plan	Any revision of the LURMP and or consistency issues with the final Delta Plan could require revision of the Conservancies Strategic Plan. The SP will be reviewed

Date Received	Correspondent; method	Comment	How Addressed
			against the final Delta Plan to determine the need for revision.
	P23/Line11-13	The ESP and its recommendations are subject to consistency review by DSC.	The draft will reflect this expectation of review.
	P30/Line 14-16	The stated policy of not supporting programs or activities that produce impacts that are not mitigated, is too limiting.	This section will be revised to provide more clarity.
	P31/ Box	Order of the goals if not prioritized should be stated as such.	It is an impossible challenge to order the goals to suit all interests in the Delta Conservancy. Language will be added to suggest that the goals are not in an order of priority.
*	P41/Line 7-9	The notion of crediting conservation values is confusing given the Conservancy is not a regulatory agency.	Comment noted, section removed.
*	P44/Line 11	What does broker mean?	Comment noted, clarification language has been added.
*	P44/Line 19-22	What is the purpose of purchasing existing available mitigation credits?	Comment noted, clarification language has been added.
*	P65-66/Line 33-1	Section implies potential conflict and working at cross purposes rather than consistency and collaboration.	Comment noted, no intention of cross purposes, language has been added to clarify.
4-20-12	DWR FESSRO, letter		
	General Comments	The strategic plan appears to de-emphasize the Conservancy's role as a lead agency for ecosystem restoration.	The legislation creates the expectation that the Conservancy will conduct ecosystem restoration and economic development in a balance manner. We believe our SP is consistent with the intent of the legislation in this regard. There is no intent to de-emphasize the restoration component of the Conservancy mandate. Language has been added to the introduction of the Goals section to specify that the goals are not listed in a priority order.

Date Received	Correspondent; method	Comment	How Addressed
		Addressing resiliency of the Delta is a key concept, climate change is addressed in Goals 1 and 2 but should be developed into a more complete strategy that considers resiliency and what it means to the future of the Delta.	The climate change section has been moved to the Criteria section to better reflect its importance in all aspect of the Conservancy's work. Additionally, the Conservancy's climate change policy that was developed in collaboration with Delta interest and adopted by the Conservancy Board, will be included in the Strategic Plan as an attachment.
*		The Conservancy should broaden its ability to assume land management under various circumstances in support of restoration of contiguous parcels.	The Conservancy's enabling legislation allows the agency to hold title to lands and to hold easements. While we anticipate this role we are also sensitive to concerns raised about the Conservancy being a major consolidator of publically owned lands in the Delta. We have committed to working collaboratively with our sister agencies and the recently formed Delta Land Trusts Workgroup to, on a project by project basis, identify which agency or organization can most effectively and efficiently get a targeted piece of land under ownership, restore the land if not already restored and manage the land in perpetuity. We anticipate the need to own and manage land over time in support of future contiguous parcel restoration, language will be added to support this expectation.
		Requiring full economic and environmental mitigation for all activities may preclude opportunities in accomplishing the Conservancy's primary mission.	It will be the policy of the Conservancy to assess all impacts and determine appropriate mitigation. Language will be revised to address the comment.
	Specific Comments		
	P17/Line 16-17	Is DC prohibited from developing regulations through typical rule-making process (LAO revising CA Code of Regulations) vs. prohibited from pursuing any eminent domain process/procedure? (see p. 55, line 7)	The Conservancy has no regulatory authority. Rule making processes to develop programs and grant making processes are anticipated.
*	P17/Line 23-25	Not sure that other conservancies cannot so act; WCB funds acquisitions of water rights; SCC does act in	The Wildlife Conservation Board is not considered a State Conservancy. Clarification recognizing the Coastal



Date Received	Correspondent; method	Comment	How Addressed
		watersheds that affect the coastal zone, sometimes quite far inland.	Conservancy's ability to work beyond its formal boundaries will be added.
	P20/Line 20-23	"The Delta Plan contains no enforceable regulations pertaining to Delta economic enhancement activities, but <b><i>it will establish performance measure seeking maintenance or increase of the gross revenues of Delta agriculture</i></b> , Delta recreation, and Delta ecotourism-agri-tourism (DP p. 200)." (emphasis added) Any establishment of performance measures which seek to maintain/increase gross revenues – especially for agriculture –fails to consider the many factors which can and do influence gross revenues including markets, weather, etc.	Comment noted. The Conservancy intends to take all appropriate factors into consideration when developing performance measures.
	P28/Line 6, 22	Use of the term "Delta Finance Plan" here maybe ambiguous to readers. What document does this refer to? If it is a DC document it would be clearer to state specifically this would be the Conservancy's Plan. This would clarify the intent from other agencies' "Delta Finance Plan".	Comment noted. Language will be added to clarify that the Delta Regional Finance Plan is a Conservancy document intended to characterize the near-term needs of the Delta.
	P33/Line 30-31	Make the statement clear that assistance will not be to individual farmers but to benefit all or most all farming activities in supporting marketing. Avoid 'gifts' of public funds wording.	The strategies within the Strategic Plan have been substantially revised. The referenced strategy has been incorporated into another strategy.
	P35/Line 14	Strategy 1.8.1 should include coordination with DWR and CA Emergency Management Agency (CalEMA) as well.	The strategy has been revised to state that the Conservancy will coordinate will appropriate state agencies.

Date Received	Correspondent; method	Comment	How Addressed
	P36/Line 18-22	Use of the language, <i>the Conservancy will design restoration projects to promote <b>continued economic use</b> of the restored lands</i> , is vague and may result in unreasonable expectations.	The intention here is to describe a commitment to look for ways to keep working landscapes viable and look for opportunities to enhance the economic value of restored areas. This will be a primary focus of the Conservancy when designing restoration efforts. While the degree to which economic value can be added will vary with each project, we anticipate few projects that would have no opportunity to promote continued use.
	P41/Line 5-6	Should include reference to being able to establish and utilize endowments to fund long term maintenance and monitoring of restoration projects especially as it relates to crediting by regulating agencies.	The Conservancy's ability to create and manage endowments is described in the Legislation and Program section of the Introduction to the Strategic Plan.
	P41/Line 27-28	Sustainability objectives may not align with regional plans, so consider how to frame this in the text. How can DC work with regional plans to meet sustainability objectives?	The intention here is to describe a commitment to look for ways to meet sustainability objectives, the language does not preclude action when sustainability objectives are challenged.
4-10-12	Rio Vista Public Meeting	The Plan should address the importance of conserving water.	Comment noted. Strategy 1.3.4 addresses the Conservancy's plan to coordinate with other entities regarding water conservation.
		The Plan needs to integrate the Central Valley Water Quality Control Board's Sacramento River and San Joaquin River Basin Plan, particularly the salinity plan and the methyl mercury requirements.	Comment noted. These plans are important and will be referenced as the Conservancy collaborates with other agencies and local residents regarding specific projects.
		Does all the focus have to be on tidal wetlands? The Plan should acknowledge that there are locations where we can, and are, doing seasonal habitat-supporting agricultural practices.	Comment noted. The Conservancy has several strategies that address the various types of habitat supporting agricultural practices. Please see Strategy 1.4.4 and Objective 3.6 regarding working landscapes.
		The Plan needs to pay more attention to public health, particularly with regard to water quality and pharmaceuticals in water, many of which originate from agriculture.	Comment noted. Please see Objective 1.3 regarding water quality.

Date Received	Correspondent; method	Comment	How Addressed
		With regard to the order of goals within the Plan, agriculture should come first, as it does, so that it comes across as a priority.	The Conservancy adopted this suggestion in its revised version.
		The Plan should acknowledge and describe more clearly the progress that has been made by farmers and others to provide a home for waterfowl.	Comment noted. Objective 3.6 lists the strategies the Conservancy intends to pursue to work with Delta farmers and others to enhance environmental attributes of working landscapes.
		We're concerned about more mosquitoes and want to make sure that the Plan encourages all restoration projects to incorporate best management practices for mosquito control.	Document revised to incorporate this suggestion. Please see Strategy 4.1.2.
		We would like to see that someone from the mosquito abatement district be included on independent technical advisory committee, as described within Section 3.6.4 of the Plan.	Comment noted. A mosquito abatement district representative would be an excellent addition to the independent technical advisory committees once they are formed.
		Local experts, such as representatives of reclamation districts and farm bureaus, should be included in the independent technical advisory committee.	Comment noted. The intention of these independent technical advisory committees is to bring in expertise from the Delta.
4-12-12	Clarksburg Public Meeting	If the Conservancy isn't authorized to utilize eminent domain, then the Plan should state that the Conservancy will not take ownership of land acquired by other entities through eminent domain	Policy question, refer to the Board.
		The Plan should make clear the Conservancy's good neighbor policy.	Policy question, refer to the Board.
		The Plan should explain who will maintain restoration projects once they are done.	Comment noted. Please see Objective 3.4, regarding strategies for long-term stewardship of restored landscapes.

Date Received	Correspondent; method	Comment	How Addressed
		The Plan should include some mechanism to help water agencies in southern California understand better who we are in the Delta.	Comment noted. Goal 5 regarding the Conservancy's intentions to use principles of collaboration, coordination, appropriate transparency and efficient use of resources can be used to achieve better understanding about the issues and needs important to the Delta and its residents.
		The Suisun Marsh should not be included within the definition of the Delta, as currently described within the Plan, and clearer language should be used with regard to how much of the Bypass is included within the Delta boundary.	Comment noted. The Legislature defined the Conservancy's service area as the legal Delta and Suisun Marsh (Public Resources Code Section 32310).
		The Plan should consider using language other than "co-equal goals" as that's not very popular language.	Comment noted. The Conservancy Board determined that co-equal responsibilities was a more accurate and appropriate way of expressing the Conservancy's approach to the mandates defined in its enabling legislation (Public Resources Code Section 32322).
		Economic development should be featured more prominently so that it appears to be as important as ecosystem restoration.	Economic development is now listed as Goal 2 in the Strategic Plan.
		The Plan should be more clear and specific about how it intends to support and respect the way of life in the Delta, as well as its culture and traditions.	Throughout the document, the Conservancy states its intention to collaborate and coordinate with Delta residents, business owners, and farmers as specific projects are identified and pursued.
		Regarding 1.4.2, perhaps the Plan should suggest that information about the Delta be disseminated from locations other than just state fairs such as elected official's offices or other places where people who don't know anything about the Delta come to.	Comment noted. The revised strategies regarding public outreach focus on collaboration and cooperation with a broader network of promotional opportunities in the Delta region.
4-14-12	Oakley Public Workshop	Humans and their relationship to water should be featured more prominently within the Plan.	Comment noted.

Date Received	Correspondent; method	Comment	How Addressed
		The Plan should specifically endorse responsible agricultural practices.	Comment noted. Many of the goals, objectives, and strategies in the Plan highlight the opportunities the Conservancy sees for itself to promote and work with Delta residents and farmers in identifying who specific responsible agricultural practices could be now and in the future.
		The Plan should specifically address climate change, especially in light of declining snowpack.	Text was revised to include reference to the Conservancy's climate change policy under the "Criteria" portion of Section V. The actual policy is included as Appendix C in the revised Plan.

Cells marked in green indicate editorial considerations yet to be incorporated.

Cells marked in peach indicate possible policy questions the Board may want to talk about at its May 16 or later meetings.

Last updated 5-8-12; 1:55 p.m.